REMARKS/ARGUMENTS

Claim Amendments

The Applicant has amended claims 8, 13 and 14; claims 9 and 15 have been canceled. Applicant respectfully submits no new matter has been added. Accordingly, claims 8 and 10-14 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

Response to Paragraph 4

The Applicant respectfully asserts that the arguments set forth in the previous response have not been fully addressed. With respect to the assertion that Ylonen discloses a security controller that allocates negotiated SAs among Security Procedure modules, the argument presented in the Detailed Action does not address the issue of coupled Security Procedure modules (claims 9 and 15) capable of forwarding IP packets to each other.

The Detailed Action (page 8, para. 2) indicates that an argument was presented that there is no suggestion to combine the Ylonen and Nikander references. The Applicant respectfully submits that the Applicant made no argument regarding combination of the two references.

The Detailed Action notes on page 9 that the Applicant has argued that the references fail to show certain features of applicant's invention, i.e., Security Procedure modules. The Applicant disagrees. Claim 8 introduces the Security Procedure modules; "a plurality of security procedure modules coupled to the at least on IP forwarder and arranged to implement security procedures for received IP packets..."; Claim 9 further limits the security procedure modules. "...coupled together to allow the forwarding..."; claim 10 describes the relationship between the filters and the security procedure modules and claim 13, 14 and 15 all include the Security Procedure modules reference.

It is further noted in the discussion regarding the Applicant's previous arguments (page 10, para. 3) that the prior art need not disclose anything over and above the

invention as claimed in order to render the claims unpatentable or anticipated. The Applicant agrees with the statement, but the Applicant respectfully asserts that the prior art does not disclose the coupling of Security Procedure modules (claim 9 and 15) or the security controller arranged to allocate negotiated SAs among the security modules. Therefore the lack of the abovementioned limitations prevents the prior art from disclosing or teaching the Applicant's claimed limitations.

Claim Rejections – 35 U.S.C. § 103 (a)

Claims 8-15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ylonen et al (US 6,438,612 B1) and further in view of Nikander et al (US 6,253,321 B1). The Applicant has canceled claims 9 and 15. The Applicant respectfully traverses the rejection of the remaining claims, 8 and 10-14.

Claims 8 and 14 have been amended by incorporating the limitations of claims 9 and 15, respectively. The Applicant respectfully submits that the limitation of coupling Security Procedure modules for forwarding IP packets between the modules is not disclosed in either the Ylonen or Nikander references. Further, the Applicant respectfully submits that the combination of Ylonen and Nikander does not disclose or suggest the coupling limitation. This being the case, the Applicant respectfully requests the withdrawal of the rejection of claims 8 and 14.

The Applicant has reviewed all the past Office Actions and notes that the same rejection is applied to claims 9-11 and there has been no response to the Applicant's arguments other than "limitations similar to those of claim 12". The Applicant respectfully submits that the Detailed Action does not provide a reasonable argument regarding the rejection of these claims.

The Detailed Action states that claims 9-11 have limitations similar to those of claim 12 and bases the rejection of these claims on the rationale applied against claim 12. The Applicant argued the same point in the last response. Claim 9 provides a further limitation to claim 8, coupling security procedure modules together for forwarding an IP packet from one security procedure module to another of the plurality of modules.

Claims 10 and 11 disclose modifying IP packet filters, which are responsible for routing IP packets to the security procedure modules and the SPI is one of the selectors used for filtering the packets. Claim 12 discloses coupling an IKE module to the security controller and the interaction between the security controller and the IKE module. Thus, claims 9-11 do <u>not</u> have similar limitations to those limitations in claim 12. Claim 9 has been canceled and the limitations of claim 9 have been incorporated in claim 8. But, the argument with respect to claims 10 and 11 are still the same. Additionally, claims 10-11 contain the same limitations as claim 8 including coupling the Security Procedure modules. Therefore, the Applicant respectfully requests the withdrawal of the rejection of claims 10-11.

The Ylonen reference is cited against claim 12 for teaching coupling the security controller to an IKE module and arranging the security controller to receive details of negotiated SAs from the IKE module. The Applicant respectfully asserts that Ylonen does not disclose coupling the Security Procedure modules wherein IP packets may be forwarded between the security procedure modules. This being the case, the Applicant respectfully requests withdrawal of the rejection of claim 12.
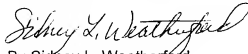
The Nikander reference is cited for teaching implementing the security controller, security procedure modules and IP forwarder in hardware, software or both. However, Nikander lacks the teaching of coupling the Security Procedure modules, wherein the IP packets may be forwarded between the modules. The Applicant respectfully requests withdrawal of the rejection of claim 13.

CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted.

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